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8 **UNITED STATES DISTRICT COURT**  
9  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA, | 2:16-cr-00265-GMN-CWH

12 Plaintiff, |

13 v. | **STIPULATION AND ORDER**  
14 JEREMY JOHN HALGAT, | **TO CONTINUE DEADLINE TO RE-**  
15 Defendant. | **FILE MOTION TO COMPEL (Doc.**  
16 1417, 858)

17 IT IS HEREBY STIPULATED AND AGREED, by and between the United States of  
18 America, by and through Dayle Elieson, United States Attorney, and Christopher Burton,  
19 Assistant United States Attorney, and JEREMY JOHN HALGAT, by and through his attorney,  
20 Richard E. Tanasi, Esq., that the **deadline to re-file Defendant Halgat's Motion to Compel** in  
21 the above-captioned matter, now scheduled for ***January 11, 2019***, be vacated and continued  
22 ***February 11, 2019***.

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2 This Stipulation is entered into for the following reasons:

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4 1. On December 26, 2018, this Honorable Court Ordered Defendant Jeremy John  
5 Halgat to re-file a more specific Motion to Compel (ECF No. 858), no later than January 11,  
6 2019, after he narrows the discovery issues and meets and confers with the government. (ECF  
7 No. 1417). Defense counsel needs additional time to review the currently large volume of  
8 discovery, and then meet and confer with the Government to determine whether the issues  
9 raised in Jeremy John Halgat's Motion to Compel (ECF No. 858) are still ripe.

10 2. This is the first stipulation to continue this deadline in this matter.

11 3. The additional time requested herein is not sought for purposes of delay.

12 4. Additionally, denial of this request for continuance could result in a miscarriage  
13 of justice.

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15 **WHEREFORE**, the parties respectfully request that this Honorable Court accept the  
16 Stipulation and enter an Order as set forth below, continuing the **deadline to re-file Defendant**  
17 **Halgat's Motion to Compel** in the above-captioned matter, now scheduled for ***January 11,***  
***2019, to February 11, 2019.***

18 DATED this 3<sup>rd</sup> day of January, 2019.

20 21 22 23 24 25 26 27 28	DAYLE ELIESON United States Attorney  <u>/s/</u>  CHISTOPHER BURTON Assistant United States Attorney 501 Las Vegas Blvd., South Suite 1100 Las Vegas, NV 89101 Attorney for the UNITED STATES	TANASI LAW OFFICES  <u>/s/</u>  RICHARD E. TANASI, ESQ. 601 S. Seventh Street, 2 <sup>nd</sup> Floor Las Vegas, NV 89101 Attorney for Defendant
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**UNITED STATES DISTRICT COURT**

# **DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  <i>Plaintiff</i>	2:16-cr-00265-GMN-CWH
v.	<b>ORDER ON STIPULATION</b>
JEREMY JOHN HALGAT,  <i>Defendant.</i>	

This matter coming before the Court on Stipulation to Continue Sentencing Hearing, the Court having considered the matter, and good cause showing, the Court accepts the Stipulation.

1. On December 26, 2018, this Honorable Court Ordered Defendant Jeremy John Halgat to re-file a more specific Motion to Compel (ECF No. 858), no later than January 11, 2019, after he narrows the discovery issues and meets and confers with the government. (ECF No. 1417). Defense counsel needs additional time to review the currently large volume of discovery, and then meet and confer with the Government to determine whether the issues raised in Jeremy John Halgat's Motion to Compel (ECF No. 858) are still ripe.

2. The additional time requested herein is not sought for purposes of delay.

3. Additionally, denial of this request for continuance could result in a miscarriage of justice.

**WHEREFORE, IT IS HEREBY ORDERED**, that the deadline to re-file Defendant Halgat's Motion to Compel in the above-captioned matter, now scheduled for ***January 11, 2019***, be vacated and continued to February 11, 2019.

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UNITED STATES MAGISTRATE JUDGE

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DATED: January 4, 2019

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 3rd day of January, 2019 , the undersigned served the foregoing **STIPULATION AND ORDER** on all counsel of record herein by causing a true copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via electronic transmission by the Clerk of Court pursuant to local order.

/s/  
An employee of TANASI LAW OFFICES